

EPA Comment Number: 550-25

Received: September 2, 1999

To: az9999@earthlink.net, Homepage Oppts/DC/USEPA/US@EPA
cc:

Subject: Re: Bottom Line of the FOOD SAFETY .

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>SUBJECT: The Bottom Line of the "FOOD SAFETY."

>

>Dear Professor, How are you ?

>

> The President's Inter-Agency Council on Food Safety is in the
>process of developing a strategic plan and is requesting public input for
>Food Safety.

>

> Food safety hazards must first and foremost be addressed at the
>source with mandatory safeguards at the animal production stage. Such
>safeguards should include more humane and hygienic treatment and
>conditions for billions of farm animals. Short of this, any food safety
>plan is doomed to fail. Also regulatory authority at the production stage
>must be expanded, with adequate funding actively sought. The agriculture
>industry is exerting a great deal of pressure to exclude animals from
>consideration in the council's plan. Though the plan is touted as a
>"prevention-based system" the attention given to animal production
>problems is continually diminishing.

>

> Animal production is overflowing with problems for animals and
>ultimately, consumers:

>

> Inhumane and unhygienic transport and slaughter

>

> Overcrowded animals and stressful procedures and conditions

>

> The excessive use of antibiotics and other drugs

>

> Chicken litter and feces in feed

>

> Diseased animals rendered into animal feed

>

> We would like to address the following few important issues in some
>more depth, which affect millions of Americans :

>

> SLAUGHTERHOUSES:

>

> Below is a typical example(IBM meat processing plant) of the
>modern day slaughterhouses in the United States :

>

> Animals who are supposed to be stunned and rendered unconscious with
>stun guns and bullets move down the line fully conscious and in distress,
>often flailing and even falling off hooks onto the "kill line", injuring
>workers on a daily basis. Numerous employees on the kill floor shockingly
>admit that between thirty and fifty percent of the cows being slaughtered
>are fully conscious and alive as they move down the kill line. One worker
>shared gruesome accounts of suffering, terrified animals being regularly
>skinned alive at his station.

>

> In the quickly moving processing line, workers do not have time to
>remove pus-filled abscesses found in the fresh-killed meat whizzing down
>the conveyor belt. They also don't have time to sanitize slabs of meat
>that sometimes fall to the floor and become contaminated. This meat is not
>removed from the line; instead, it is packaged for sale to grocery stores
>and school cafeterias throughout the state. One IBM employee readily
>admitted to concerns about e.coli and other health hazards resulting from
>unsanitary conditions.

>

> Because of the continual push for increased production and line
>speeds , workers are frequently denied bathroom and lunch breaks. Women
>working on the line are forced to choose between urinating in their pants
>or taking a bathroom break and losing their job. (Source: NARN , Northwest
>Animal Rights Network, June , 1999)

>

>(Note: Animals are killed indiscriminately cruelly no matter they come
>from factory farms or from "family farms " .)

>

> "Are you brave enough to admit that the one natural reservoir of E.
>Coli 0157:H7 has been proven to be the intestinal tract of cattle ? That
>the avenue of infection is feces splattered on our meat ? That the disease
>which was extremely rare only a decade ago has now become the leading
>cause of kidney failure in US children ? That all this suffering is in
>direct correlation to the deregulatory programs of the last two
>administrations ?" ---- Mary Heersink, founder, Safe tables Our Priority,
>to USDA officials at a hearing on meat inspection, June 1993. (Source:
>"Slaughterhouse" by Gail Eisnitz)

>

> ANTIBIOTICS IN FACTORY FARMS :

>

> Factory farm intensive confinement conditions result in severe
>physiological as well as behavioral afflictions in all farm animals.
>Anemia, influenza, intestinal diseases, mastitis, metritis, orthostasis,
>pneumonia, and scours are only the beginning of a long list of ailments.
>Factory farms are a breeding ground for stress and infectious diseases.

>

> Medical doctors now warn that the tragedy of factory farming reaches
>well beyond the farm animals themselves. According to a broad spectrum of
>scientists, the high level of contaminants in factory farm products now
>poses a serious danger to human health. Studies in the New England Journal
>of Medicine and research by the U.S. Centers for Disease Control, National
>Resources Defense Council, and the FDA all warn that the levels of

>antibiotics and other contaminants in commercially raised meat constitute
>a serious threat to public health.

>

> Approximately 50% of all antibiotics manufactured in the United
>States are poured directly into animal feeds. The most commonly used
>antibiotics are penicillin and tetracycline. The squandering of these
>important drugs in livestock production is wreaking havoc for physicians
>in the treatment of human illness.

>

> Widespread overuse of antibiotics is resulting in the evolution of
>new strains of virulent bacteria whose resistance to antibiotics poses a
>great threat to human health. Doctors are now reporting that, due to their
>uncontrolled use on factory farms, these formerly life-saving drugs are
>often rendered useless in combating human disease. Dr. Jere Goyan, Dean of
>the School of Pharmacy at the University of California, San Francisco,
>states that the indiscriminate use of antibiotics in animal feed is
>leading to "a major national crisis in public health. Unless we take
>action now to curb the use of these drugs in the livestock industry, we
>will not be able to use them to treat human disease."

>

> Dr. Karim Ahmed, head scientist of the National Resources Defense
>Council, has long urged Congress to impose immediate controls on the use
>of antibiotics in animal feed. According to Dr. Ahmed, unless swift action
>is taken, "we are going to have an epidemic of untreatable stomach
>ailments, many of which will end in death." Unfortunately, the crisis has
>already begun. Scientists now calculate that the misuse of penicillin and
>tetracycline in animal feed is implicated in more than 2,000,000 cases of
>Salmonella poisoning each year, resulting in as many as 2,000 human
>deaths. (Source: Humane Farming Association.)

>

> BGH (BOVINE GROWTH HORMONE) DAIRY COWS :

>

> The use of BGH hormone has made so many cows so sick. Melvin Vanheel
>of Little Falls, Minnesota reported that , after using BGH, "The majority
>of my cows had some health problem---mastitis, lumps and open sores at the
>infection site, heat stress, and so on. My vet finally said to quit
>using BGH."

>

> Florida dairy farmer Charles Knight experienced such severe mastitis
>problems within his herd that his milk was rejected by his milk
>cooperative because of its high " pus " content. (Source: Humane Farming
>Association.)

>

> Got PUS ? There's more "PUS" in the milk people drink, says the
>publisher of Consumer Reports magazine, thanks to higher infection rates
>in cows caused by the use of growth hormones. To produce that milk, one
>dairy cow excretes 120 pounds of waste every day-as much as two dozen
>people. Manure from factory farms often ends up in our waterways.

>

> FORCED MOLTING ON EGG PRODUCING HENS :

>

> Every year, when egg production drops, approximately 195 million hens
>in North America endure a bizarre torment called "FORCED MOLTING". This
>cruel practice throws the hens' systems into collapse, stressing and

>shocking their worn-out bodies into laying one more batch of eggs before
>being sent to slaughter. The frightened birds are deprived of food for up
>to two weeks, water is restricted for up to eight weeks.
>
> USDA's own research shows that forced molting makes hens farm more
>susceptible to Salmonella, exacerbating the food safety issue already
>plaguing the egg industry. The studies show that forced molting increases
>the frequency and severity of Salmonella enteritidis among hens. The
>stressful conditions weaken their immune systems so badly that they become
>prone to disease and salmonella infections. It stated unmolted hens
>usually have to ingest about 50,000 Salmonella cells to become infected,
>molted hens need fewer than ten. The result is sick birds and contaminated
>eggs. (Source: United Poultry Concerns).
>
> If you would like to help, please be kind enough to send your
>comments to the Food and Drug Administration as soon as possible to :
>
> FDA/Dockets Management Branch (HFA-305)
>
> 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852 (Be sure to
>include the Docket No. 97N-0074.)
>
> If send by e-mail , send them to
><mailto:oppts.homepage@epa.gov>oppts.homepage@epa.gov (must send email as
>an ASCII file and identify them as being for Docket No. OPP-00550.)
>
> We are very grateful to you for your kindness, compassion and help.
>
>Very Truly Yours, J. Zehringer, L. Thibidore
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>

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*SUBJECT: The Bottom Line of the "FOOD SAFETY."*

*Dear Professor, How are you ?*

*The President's Inter-Agency Council on Food Safety is in the process of developing a strategic plan and is requesting public input for Food Safety.*

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*The excessive use of antibiotics and other drugs*

*Chicken litter and feces in feed*

*Diseased animals rendered into animal feed*

*We would like to address the following few important issues in some more depth, which affect millions of Americans :*

#### **SLAUGHTERHOUSES:**

*Below is a typical example (IBP meat processing plant) of the modern day slaughterhouses in the United States :*

*Animals who are supposed to be stunned and rendered unconscious with stun guns and bullets move down the line fully conscious and in distress, often flailing and even falling off hooks onto the "kill line", injuring workers on a daily basis. Numerous employees on the kill floor shockingly admit that between thirty and fifty percent of the cows being slaughtered are fully conscious and alive as they move down the kill line. One worker shared gruesome accounts of suffering, terrified animals being regularly skinned alive at his station.*

*In the quickly moving processing line, workers do not have time to remove pus-filled abscesses found in the fresh-killed meat whizzing down the conveyor belt. They also don't have time to sanitize slabs of meat that sometimes fall to the floor and become contaminated. This meat is not removed from the line; instead, it is packaged for sale to grocery stores and school cafeterias throughout the state. One IBP employee readily admitted to concerns about e.coli and other health hazards resulting from unsanitary conditions.*

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*Approximately 50% of all antibiotics manufactured in the United States are poured directly into animal feeds. The most commonly used antibiotics are penicillin and tetracycline. The squandering of these important drugs in livestock production is wreaking havoc for physicians in the treatment of human illness.*

*Widespread overuse of antibiotics is resulting in the evolution of new strains of virulent bacteria whose resistance to antibiotics poses a great threat to human health. Doctors are now reporting that, due to their uncontrolled use on factory farms, these formerly life-saving drugs are often rendered useless in combating human disease. Dr. Jere Goyan, Dean of the School of Pharmacy at the University of California, San Francisco, states that the indiscriminate use of antibiotics in animal feed is leading to "a major national crisis in public health. Unless we take action now to curb the use of these drugs in the livestock industry, we will not be able to use them to treat human disease."*

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*We are very grateful to you for your kindness, compassion and help.*

*Very Truly Yours, J. Zehringer, L. Thibidore*

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Joanne O. Lee

Administrative Secretary II

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